

### REMARKS

In the Restriction Requirement mailed March 30, 2007, the Examiner has asserted a restriction of the claims under 35 U.S.C. § 121 to one of the following:

- I. Claims 17 and 19-24, drawn to a CRM system, classified in class 705 subclass 1.
- II. Claim 51, drawn to a CRM content provider system, classified in class 705, subclass 1.
- III. Claim 62, drawn to a CRM system, classified in class 705, subclass 1.
- IV. Claims 1, 13, 14, 15, 37, 55, 69, 70, 73 and 76 drawn to operating a content provider system classified in class 705, subclass 1.

(Restriction Requirement at 1.) In response, Applicant provisionally elects, *with traverse*, to prosecute Group IV, identified in the Restriction Requirement as claims 1, 13, 14, 15, 37, 55, 69, 70, 73 and 76. Applicant respectfully submits that previously provisionally-elected claim 2, which depends from claim 1 of Group IV, should also be included in Group IV for any further examination. *See* Response of February 3, 2006 (provisionally electing, *with traverse*, claims 1, 2, 13, 14, 15, 17, 19, 20, 21, 22, 23, 24, 37, 51, 55, 62, 69, 70, 73, and 76, in response to rejection based on multiplicity of claims under § 112 ¶ 2).

### Grounds For Traversal

The MPEP notes that there are two separate criteria for a proper restriction between patentably distinct inventions:

- (A) The inventions must be independent or distinct as claimed; and
- (B) There would be a serious burden on the examiner if restriction is not required.

*See* MPEP § 803. To establish a serious burden, the Examiner “must show by appropriate explanation one of the following: (A) separate classification thereof... (B) A separate status in the art when they are classifiable together... (C) A different field of search...” *See* MPEP § 808.02.

In the present case, the Examiner has indicated that Groups I-IV are all classified in the same class 705, subclass 1. *See* Restriction Requirement of March 30, 2007 at p. 2.

Furthermore, there is no objective evidence of record these Groups have acquired separate status in the art. *See* MPEP § 808.02. Although the Restriction Requirement asserted these Groups “have acquired a separate status in the art as shown by their different classification,” (*see* Restriction Requirement of March 30, 2007 at p. 2) – this is clearly factually incorrect, since the same classification has been applied to each of these Groups. Finally, the Restriction Requirement has not provided objective evidence that it would be necessary to employ different fields of search. *See* MPEP § 808.02. In fact, the claims spanning Groups I-IV were previously collectively examined and rejected in the Office Action of June 13, 2006 – providing clear evidence of record that the fields of search were not so different as to cause undue burden in examination.

Accordingly, Applicant respectfully submits that both criteria for a proper restriction have not been met. Hence, Applicant respectfully requests reconsideration and withdrawal of the restriction between Groups I, II, III, and IV.

RESPONSE TO RESTRICTION REQUIREMENT

Serial Number: 10/081,125

Filing Date: February 21, 2002

Title: DISTRIBUTED CUSTOMER RELATIONSHIP MANAGEMENT SYSTEMS AND METHODS

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Dkt: 1546.013US1

**CONCLUSION**

Applicant respectfully submits that the claims are in condition for allowance, and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney at (612) 373-6951 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,

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By their Representatives,

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Date April 24, 2007 By   
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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on this 24 day of April 2007.

LISA ROSAROFF  
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Signature